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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

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In re: Chapter 11

PURDUE PHARMA L.P., *et. al.*, Case No. 19-23649 (RDD)

Debtors.¹ (Jointly Administered)
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**VERIFIED STATEMENT OF THE AD HOC COMMITTEE OF NAS BABIES
PURSUANT TO FEDERAL RULE OF BANKRUPTCY PROCEDURE 2019**

Pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), the Ad Hoc Committee of NAS Babies (the “**Ad Hoc Committee**”) holding general unsecured claims in the above captioned chapter 11 cases, by and through its undersigned counsel, hereby submits this verified statement (the “**Statement**”) and states as follows:

1. Beginning in September 2019, Tarter Krinsky & Drogin LLP (“**TKD**”) provided limited advice to members of the Ad Hoc Committee regarding various bankruptcy-related

¹ The Debtors in these cases, along with the last four digits of each Debtor’s registration number in the applicable jurisdiction, are as follows: Purdue Pharma L.P. (7484), Purdue Pharma Inc. (7486), Purdue Transdermal Technologies L.P. (1868), Purdue Pharma Manufacturing L.P. (3821), Purdue Pharmaceuticals L.P. (0034), Imbrium Therapeutics L.P. (8810), Adlon Therapeutics L.P. (6745), Greenfield BioVentures L.P. (6150), Seven Seas Hill Corp. (4591), Ophir Green Corp. (4594), Purdue Pharma of Puerto Rico (3925), Avrio Health L.P. (4140), Purdue Pharmaceutical Products L.P. (3902), Purdue Neuroscience Company (4712), Nayatt Cove Lifescience Inc. (7805), Button Land L.P. (7502), Rhodes Associates L.P. (N/A), Paul Land Inc. (7425), Quidnick Land L.P. (7584), Rhodes Pharmaceuticals L.P. (6166), Rhodes Technologies (7143), UDF LP (0495), SVC Pharma LP (5717) and SVC Pharma Inc. (4014). The Debtors’ corporate headquarters is located at One Stamford Forum, 201 Tresser Boulevard, Stamford, CT 06901.

issues in connection with Purdue Pharma L.P. and its affiliates (collectively, the “Debtors”) chapter 11 filings.

2. On September 15, 2019 (the “Filing Date”), the Debtors filed these chapter 11 cases. Since the Filing Date, TKD has provided bankruptcy related advice to counsel for the NAS Babies.

3. On or about October 21, 2019, the Ad Hoc Committee entered into an agreement for TKD to represent it in connection with the Debtors’ chapter 11 cases.

4. As of the date hereof, TKD represents only the Ad Hoc Committee. TKD does not represent or purport to represent any other entities or individuals in connection with these chapter 11 cases. TKD does not represent the Ad Hoc Committee as a “committee” (as such term is used in the Bankruptcy Code and the Bankruptcy Rules) and does not undertake to represent the interests of, and is not a fiduciary for, any creditor, party in interest, or other entity that has not signed a retention agreement with TKD. In addition, the Ad Hoc Committee does not represent or purport to represent any other individuals or entities in connection with the Debtors’ chapter 11 cases.

5. The members of the Ad Hoc Committee hold claims against the Debtors’ estates.² In accordance with Bankruptcy Rule 2019, a list of the names, addresses and the “nature and amount of all disclosable economic interests” held in respect of the Debtors as of October 21, 2019, by each member of the Ad Hoc Committee is attached hereto as Exhibit A.

6. The information set forth in Exhibit A, is based on information provided by the applicable members of the Ad Hoc Committee or their counsel to TKD, is intended only to

² The Ad Hoc Committee members are individual babies (and/or guardians of such babies) who were born opioid dependent because their mothers either were prescribed opioids during pregnancy or obtained opioids on the diversionary market. The individual members of the Ad Hoc Committee are represented by lawyers and these lawyers will serve as their representative on the Ad Hoc Committee.

comply with Bankruptcy Rule 2019 and is not intended for any other purpose. TKD does not make any representation regarding the validity, amount, allowance, or priority of such claims and reserves all rights with respect thereto.

7. Nothing contained in this Statement (or **Exhibit A**) should be construed as a limitation upon, or waiver of, any rights of any member of the Ad Hoc Committee to assert, file and/or amend their claims in accordance with applicable law and any orders entered in these chapter 11 cases.³

8. Annexed hereto as **Exhibit B** is a listing of lawsuits filed against the Debtors prior to the Filing Date related to NAS Babies claims.

9. TKD reserves the right to amend and/or supplement this Statement in accordance with Bankruptcy Rule 2019.

Dated: New York, New York
October 22, 2019

Respectfully submitted,

TARTER KRINSKY & DROGIN LLP

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³ Including the right to file a class proof of claim on behalf of all members of the Ad Hoc Committee.

EXHIBIT A

MEMBER	ADDRESS	NATURE AND AMOUNT OF DISCLOSABLE ECONOMIC INTEREST
A.M.H. Individually and as legal custodian of Baby C.E.	c/o Donald E. Creadore, Esq. The Creadore Law Firm, P.C. 450 Seventh Avenue – Suite 1408 New York, NY 10123	Unsecured; Unliquidated Claim for personal injuries; Economic loss; and Medical monitoring costs
Kathleen Strain as guardian for Baby A.E.	c/o Scott R. Bickford, Esq. Martzell, Bickford & Centola 338 Lafayette Street New Orleans, LA 70130	Unsecured; Unliquidated Claim for personal injuries; Economic loss; and Medical monitoring costs
All babies born in the United States between 2001 and 2019 who were diagnosed with NAS syndrome or otherwise born with opioid dependent symptoms	c/o Kent Harrison Robbins, Esq. 242 NE 27 th Street Miami, FL 33137-4522	Unsecured; Unliquidated Claim for personal injuries; Economic loss; and Medical monitoring costs

EXHIBIT B

Client Name	Case Type	Suit filed date	Individual Docket #	State
Roach, Tyler	Class Action	2/26/18	1:18-op-45662-DAP	Louisiana
Rees, Derric and Ceonda	Class Action	2/28/18	1:18-op-45252-DAP	Illinois
Wood, Rachel	Class Action	3/3/18	1:18-op-45264-DAP	Missouri
Ambrosio, Melissa	Class Action	3/16/18	1:18-op-45375-DAP	California
Roxie Whitley, Chris and Diane Denson	Class Action	3/16/18	1:18-op-45598-DAP	Tennessee
Flanagan, Darren and Elena	Class Action	3/21/18	1:18-op-45405-DAP	Tennessee
Doyle, Erin	Class Action	5/9/18	1:18-op-46327-DAP	Ohio
Hunt, Shannon	Class Action	5/10/18	1:18-op-45681-DAP	Maryland
Moore, Bobbi Lou	Class Action	8/15/18	1:18-op-46305-DAP	West Virginia
Hanlon, Amanda	Class Action	8/23/18	1:19-op-45052-DAP	New York
Hampel, Jessica	Class Action	6/14/19	1:19-op-45473-DAP	Alabama
Peterson, Sally	Class Action	6/14/19	1:19-op-45472-DAP	Arkansas
Whittaker, Shelly	Class Action	6/14/19	1:19-op-45475-DAP	Colorado
Brumbarger, Brandi	Class Action	6/14/19	1:19-op-45469-DAP	Indiana
Means, Corey	Class Action	6/14/19	1:19-op-45470-DAP	Louisiana
Cruz, Gloria	Class Action	6/14/19	1:19-op-45466-DAP	Massachussetts
Ellis, Esperenza	Class Action	6/14/19	1:19-op-45464-DAP	New Mexico
DeMaro, Samantha	Class Action	6/14/19	1:19-op-45465-DAP	Oklahoma
Lechuga, Niola	Class Action	6/14/19	1:19-op-45468-DAP	Oregon
Paul, Chloe	Class Action	6/14/19	1:19-op-45467-DAP	South Carolina
Rodriguez, Jessica	Class Action	6/14/19	1:19-op-45463-DAP	Utah
Tuttle, Nicole	Class Action	6/15/19	1:19-op-45476-DAP	Delaware
Hamawi, Marijha; Meghan Lara	Class Action	6/15/19	1:19-op-45477-DAP	Kentucky
Gauthier, Krista; Angela Sawyers; Jessica Springborn	Class Action	6/15/19	1:19-op-45478-DAP	Michigan
Delancey, Christina	Class Action	6/15/19	1:19-op-45480-DAP	Nevada
Simonson, Alicia	Class Action	6/15/19	1:19-op-45479-DAP	North Dakota
Stewart, Wendy	Class Action	6/15/19	1:19-op-45481-DAP	Ohio
Cherry, Angela	Class Action	6/16/19	1:19-op-45490-DAP	Arizona
Warren, Desirae	Class Action	6/16/19	1:19-op-45486-DAP	Georgia
Weatherwax, Quincy	Class Action	6/16/19	1:19-op-45483-DAP	Montana
Flach, Brittany	Class Action	6/16/19	1:19-op-45488-DAP	New Jersey
Ivie, Billie	Class Action	6/16/19	1:19-op-45489-DAP	North Carolina
Carlson, Desiree	Class Action	6/16/19	1:19-op-45487-DAP	Pennsylvania
Williams, Farrah	Class Action	6/16/19	1:19-op-45485-DAP	Tennessee
Martinez, Jacquelynn	Class Action	6/16/19	1:19-op-45484-DAP	Virginia
Shewmake, Shilo	Class Action	6/16/19	1:19-op-45482-DAP	Washington
Brant, Shelby L.	Class Action	6/17/19	1:19-op-45494-DAP	Arizona
Artz, Jennifer	Class Action	6/17/19	1:19-op-45459-DAP	California
Meinecke, Kjells	Class Action	6/17/19	1:19-op-45493-DAP	Minnesota
Ortiz, Maria	Class Action	6/17/19	1:19-op-45492-DAP	Wisconsin
Gilson, Jamie	Individual	6/14/19	1:19-op-45461-DAP	Alaska
Berzinski, April	Individual	6/17/19	1:19-op-45503-DAP	Wisconsin
Johnson, Jamie	Individual	6/17/19	1:19-op-45504-DAP	Indiana
Martin, Penny	Individual	6/17/19	1:19-op-45508-DAP	Indiana
Muffley, Amanda	Individual	6/17/19	1:19-op-45507-DAP	Maryland
Alexander, Melba	Individual	6/17/19	1:19-op-45502-DAP	Mississippi
Kirk, Krystle	Individual	6/17/19	1:19-op-45509-DAP	North Carolina
Collier, Jessica	Individual	6/17/19	1:19-op-45506-DAP	Ohio

Client Name	Case Type	Suit filed date	Individual Docket #	State
Howell, Reannan	Individual	6/17/19	1:19-op-45520-DAP	Texas
Johnson, Aracya	Individual	6/18/19	1:19-op-45521-DAP	Alaska
Goss, Heather	Individual	6/18/19	1:19-op-45518-DAP	Colorado
Martin, Kimberly	Individual	6/18/19	1:19-op-45510-DAP	Florida
Gauthier, Mechelle	Individual	6/18/19	1:19-op-45514-DAP	Florida
Tindall, Nichole	Individual	6/18/19	1:19-op-45530-DAP	Florida
Lively, Carol	Individual	6/18/19	1:19-op-45523-DAP	Georgia
Lyle, Alyssa	Individual	6/18/19	1:19-op-45524-DAP	Georgia
Hutchins, Kiana	Individual	6/18/19	1:19-op-45505-DAP	Indiana
Kommer, Elizabeth	Individual	6/18/19	1:19-op-45522-DAP	Indiana
Gibson, Amanda	Individual	6/18/19	1:19-op-45515-DAP	North Carolina
Massey, Melanie	Individual	6/18/19	1:19-op-45525-DAP	North Carolina
Dixon, Deborah	Individual	6/18/19	1:19-op-45511-DAP	South Carolina
Herring, Courtney	Individual	6/18/19	1:19-op-45519-DAP	South Carolina
Goldman, Jenni	Individual	6/18/19	1:19-op-45516-DAP	Texas
McAnany, Samantha	Individual	6/18/19	1:19-op-45526-DAP	Texas
Shockley, Kayla	Individual	6/18/19	1:19-op-45527-DAP	Texas
Taylor, Jessica	Individual	6/18/19	1:19-op-45528-DAP	Texas
Taylor, Lori	Individual	6/18/19	1:19-op-45529-DAP	Texas
Goforth, Rebecca	Individual	6/20/19	1:19-op-45532-DAP	Colorado
Atkinson, Sandra	Individual	6/20/19	1:19-op-45531-DAP	Florida
Perkins, Jessica	Individual	6/20/19	1:19-op-45535-DAP	Florida
Thomas, Jennifer	Individual	6/20/19	1:19-op-45542-DAP	Florida
Watson, Paula	Individual	6/20/19	1:19-op-45545-DAP	Florida
Wright, Naomi	Individual	6/20/19	1:19-op-45543-DAP	Illinois
Shepard, Amy	Individual	6/20/19	1:19-op-45536-DAP	Kentucky
Chancey, Musette	Individual	6/20/19	1:19-op-45533-DAP	Minnesota
Whittington, Kaegan	Individual	6/20/19	1:19-op-45541-DAP	Mississippi
Scully, Jenny	Individual	6/20/19	1:19-op-45544-DAP	New York
Puckett, Heather	Individual	6/20/19	1:19-op-45439-DAP	North Carolina
Richardson, Waikeisha	Individual	6/20/19	1:19-op-45538-DAP	North Carolina
VonCannon, Caroline	Individual	6/20/19	1:19-op-45540-DAP	North Carolina
Taylor Brooke Underwood	Individual	6/20/19	1:19-op-45537-DAP	Tennessee
Patterson, Gena	Individual	6/20/19	1:19-op-45534-DAP	Texas